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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

No. M-07-5944 SC  
MDL No. 1917

Court: Hon. Samuel Conti

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**STIPULATION AND ~~PROPOSED~~ ORDER  
TO EXTEND LIMITED DISCOVERY STAY**

WHEREAS the Court, on September 12, 2008, entered an Order pursuant to Stipulation, granting a Limited Stay of Discovery for six (6) months, which was to expire on March 12, 2009 (“September 12, 2008 Stay Order”);

WHEREAS the Court, on February 5, 2009, entered an Order pursuant to Stipulation modifying and extending the September 12, 2008 Stay Order until September 11, 2009, with limitations on deposition discovery continuing until January 4, 2010 (“February 5, 2009 Stay Order”);

WHEREAS on June 8, 2009, Special Master Charles A. Legge, entered an Order further extending the February 5, 2009 Stay Order, “until such time as the Court has issued its decision(s) on the various motions to dismiss that were filed on May 18, 2009 (“June 8, 2009 Stay Order”);

WHEREAS on January 5, 2010, the Court entered an Order pursuant to Stipulation

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1 modifying and extending the February 5, 2009 and June 8, 2009 Stay Orders until March 8,  
2 2010, with limitations on deposition discovery continuing until November 1, 2010  
3 (“January 5, 2010 Stay Order”);

4 WHEREAS there is an ongoing criminal grand jury investigation involving the products  
5 at issue in this case;

6 WHEREAS the parties have met and conferred and agreed to request modification and  
7 extension of the September 12, 2008, February 5, 2009, June 8, 2009, and January 5, 2010  
8 Stay Orders;

9 PLAINTIFFS, DEFENDANTS, AND THE UNITED STATES, BY AND THROUGH  
10 THEIR UNDERSIGNED COUNSEL, HEREBY STIPULATE AND AGREE AS FOLLOWS:

11 That Paragraph 3 of the January 5, 2010 Stay Order, which modified and replaced in its  
12 entirety Paragraph 3 of the September 12, 2008 Stay Order, shall remain in effect, as follows:

13 During the pendency of the grand jury proceedings and any resulting criminal  
14 trials, no discovery shall be conducted in this case (including, without limitation,  
15 document requests, interrogatories, requests to admit, or depositions) that reflects, refers  
16 to, or relates to grand jury proceedings concerning CRTs or CRT products, including any  
17 party’s or witness’s communications with the United States, or with any grand jury  
18 investigating CRTs or CRT products, except by the order of the Court upon good cause  
19 shown and consistent with governing law.

20 That Paragraph 5 of the June 8, 2009 Stay Order shall be modified and that Paragraph 2(b)  
21 of the February 5, 2009 Stay Order shall be modified and replaced in its entirety with the following  
22 new Paragraph 2(b):

23 The Stay Period, as defined in paragraph 1 of the February 5, 2009 Stay Order,  
24 extends until March 8, 2010. However, no deposition discovery may be taken until  
25 March 1, 2011, with the following exception: as of March 8, 2010, depositions may be  
26 taken of defendants’ customers or suppliers, or their employees, provided in any case that  
27 the deponent is not a defendant or a subsidiary or affiliate of a defendant, or an employee,  
28 agent, or former employee of any of them. Such deposition subpoenas may include requests

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1 for documents to be produced by the deponent at the deposition, provided that no  
2 document requests may request the production of documents disclosing the contents of the  
3 witness's testimony, if any, before the grand jury or communications with the United States  
4 that reflect, refer to, or relate to the grand jury proceedings.

5  
6 **IT IS SO STIPULATED.**

7 Dated: October 25, 2010

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**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated:      October 27, 2010     

  
\_\_\_\_\_  
Honorable Samuel Conti  
UNITED STATES DISTRICT JUDGE

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